

Exhibit A



State of Vermont
Office of the Secretary of State
128 State Street, Montpelier, VT 05633-1104
802-828-2386

Date sent: October 2, 2013

1-76068

PLAINTIFF: VERMONT JUVENILE MFG, INC., DBA PET GEAR

DEFENDANT: PATRIOT INSURANCE COMPANY

RECEIVED

OCT 15 2013

TO: PATRIOT INSURANCE COMPANY
ONE MUTUAL AVE
FRANKMUTH, MI 48787

PATRIOT INSURANCE
CLAIMS

The Secretary of State, acting as process agent, accepts service of process as required by law for the above named company and is forwarding this legal notice, via certified mail return receipt requested, including any discovery requests and amended certificates of discovery, pursuant to the following Vermont Statutes - dependent upon your corporate status:

Business Corporations:	T.11A & B, § 5.04
Nonprofit Corporations:	T.11B, § 5.04
Limited Liability Companies:	T.11, § 3011
Unregistered Foreign Corporations:	T.12, § 856

Vermont law provides for service of process in this manner under the corresponding statute named above and you must respond accordingly. The Vermont Secretary of State is a mere messenger in this process and does not review the served documents. Please contact the serving party or attorney of record if you have any questions or concerns.

Registered Mail T.1, § 134a: "Registered Mail", as the words appear in Vermont Statutes Annotated, the Vermont Rules of Civil Procedure and The Vermont Rules of Criminal Procedure, when used solely for the purpose of securing evidence of delivery, shall include any method of mail delivery requiring the signature of the addressee or his agent.

VERMONT SECRETARY OF STATE

CC: MILLER FAIGNANT & ROBBASON P.C.
PO BOX 6688
RUTLAND, VT 05702-6688

CERTIFIED MAIL RECEIPT #: 7012 3050 0001 0887 9119

STATE OF VERMONT

**SUPERIOR COURT
RUTLAND UNIT**

CIVIL DIVISION

DOCKET NO: 618-9-13 Rdcv

**VERMONT JUVENILE MFG, INC.,
DBA PET GEAR,
PLAINTIFF**

 γ

**PATRIOT INSURANCE COMPANY
DEFENDANT**

SUMMONS

THIS SUMMONS IS DIRECTED TO **PATRIOT INSURANCE COMPANY** by VT Secretary of State

1. **YOU ARE BEING SUED.** The plaintiff has started a lawsuit against you. The Plaintiffs Complaint against you is attached to this summons. Do not throw these papers away. They are official papers that affect your rights.
2. **YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail the Plaintiff a written response called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the Plaintiffs attorney located at:
Attn: John Paul Faignant, Esq.
Miller, Faignant & Robbason, PC
PO Box 6688
Rutland VT 05702-6688
3. You must also give or mail your Answer to the Court located at:
Superior Court, Rutland Unit
83 Center St., Suite 3
Rutland, VT 05701
4. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiffs Complaint. In your Answer you must state whether you agree, or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.
5. **YOU WILL LOSE YOUR CASE IF YOU DO NOT GIVE YOUR WRITTEN ANSWER TO THE COURT.** If you do not Answer within 20 days and file it with the Court, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the complaint.
6. **YOU MUST MAKE ANY CLAIMS AGAINST THE PLAINTIFF IN YOUR REPLY.** Your Answer must state any related legal claims you have against the Plaintiff. Your claims against the Plaintiff are called Counterclaims. If you do not make your Counterclaims in writing in your Answer, you may not be able to bring them up at all. Even if you have insurance and the insurance company will defend you, you must still file any Counterclaims you may have.
7. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you cannot afford a lawyer, you should ask the court clerk for information about places where you can get free legal help. Even if you cannot get legal help, you must still give the Court a written Answer to protect your rights or you may lose the case.

Joseph Paul Legend
Plaintiffs Attorney

9-27-13
Dated

Served on

10-02-13
Date

Tom Russell
Duly appointed Process Server

MILLER FAIGNANT
 & ROBBASON P.C.
 ATTORNEYS AT LAW
 P. O. BOX 6688
 13 U.S. ROUTE 7 NORTH
 TLAND, VERMONT 05702

5. Plaintiff has always paid all premiums requested by defendant and kept said policies current.
6. On June 7, 2013 while its insurance policy was in full force and effect a suit was instituted against plaintiff in Rutland Superior Court, Docket No. 363-5-13, by one Robin A. Goodwin, plaintiff's former office manager and bookkeeper.
7. Although requested, defendant has refused to provide insurance coverage and a defense for said suit.
8. Defendant claims late notice because Robin A. Goodwin was dismissed as plaintiff's employee in December 2011; however defendant has not alleged or demonstrated any prejudice.
9. Decisions of the Vermont Supreme Court clearly hold that an insurer cannot withhold insurance coverage for mere late notice unless the insurer can show prejudice.

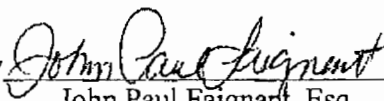
WHEREFORE, Vermont Juvenile Mfg., Inc. D/B/A Pet Gear requests the Court to decree that defendant, Patriot Insurance Company is bound and obliged to provide a defense for the Robin A. Goodwin suit and indemnity within the limits of the policy. Reimburse plaintiff all costs of this action and for such other and further relief as to the Court seems meet in the circumstances.

JURY DEMAND

Plaintiff requests a jury trial on all issues of fact.

DATED at Rutland, Vermont this 10th day of September, 2013.

MILLER FAIGNANT
& ROBBASON P.C.
ATTORNEYS AT LAW
P. O. BOX 6688
13 U.S. ROUTE 7 NORTH
RUTLAND, VERMONT 05702

By 
John Paul Faignant, Esq.
Plaintiff's Attorney

Sarah Pariseau

From: <jud-noreply@state.vt.us>
To: <jpvtlaw@comcast.net>; <mpf@sover.net>; <sarahpariseau@comcast.net>
Sent: Thursday, September 12, 2013 10:58 AM
Subject: Processing Completed for Filing # 96674

Dear John Paul Fagnant:

This email verifies the processing of Filing # 96674 submitted by you to Rutland Civil Division on 09/10/2013 01:28:10 PM. If any of the documents listed below has been rejected, please note the rejection reason and file a corrected document under "Existing Case" within seven (7) calendar days, and enter the docket number which follows:

Docket Number: 618-9-13 Rdcv Vermont Juvenile Mfg Inc dba Pet Gear VS
Patriot Insurance Company

#	Document Type	Status	Filing Date	Rejection Reason	Your Attachment
1	Initial Pleading Complaint	Accepted	09/10/2013		Complaint for Declaratory Judgment.pdf

This is a non-monitored email. Do not reply directly to it. If there is a filing fee and you have chosen to pay with cash or paper check, your payment must arrive at the court within seven (7) calendar days. If you have any questions about this filing, please contact the Rutland Civil Division.

Thank you,
Vermont Judiciary

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2013.0.3392 / Virus Database: 3222/6659 - Release Date: 09/12/13

9/27/2013

WASHINGTON COUNTY SHERIFF'S DEPARTMENT
P.O. BOX 678, 10 ELM STREET
MONTPELIER, VERMONT 05601
802-223-3001 - FAX: 802-8283611

RETURN OF SERVICE

DOCKET NUMBER: 618-9-13 Rdcw

Udmond juvenile nfg Inc v. Patriot Ins Co

STATE OF VERMONT
WASHINGTON COUNTY, SS.

ON THE 2 DAY OF October 2013, at 1113 hrs, I MADE
SERVICE

OF THE Summons, Complaint for declaratory judgment
for Insurance Coverage, jury demand, w/ exhibits

UPON THE DEFENDANT Patriot Insurance Company

BY LEAVING TWO (2) COPY OF THE ABOVE WITH THE VERMONT SECRETARY OF STATE
AT HIS/HER OFFICE IN MONTPELIER AND PAYING THE LEGAL FEE OF TWENTY DOLLARS
(\$25.00).

SECRETARY OF STATE FEE.....\$ _____

SERVICE.....\$ 50.00

TRAVEL 2 MILES@ .565\$ 1.13

POSTAGE.....\$ _____

COPIES @.50 EACH\$ _____

TOTAL.....\$ _____

Sam Rouelle
SHERIFF / DEPUTY
WASHINGTON COUNTY SHERIFF'S
DEPARTMENT